

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

JANE DOE AND A.A.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:19-CV-646
	)	
BRIDGETT BEICHLER, et. al.,	)	
	)	
Defendants.	)	

**DEFENDANTS’ MOTION FOR LEAVE TO FILE VIDEOS  
AS SUPPLEMENTAL EVIDENCE**

COME NOW the defendants, Bridgett Beichler (“Beichler”), Felix Colaciello (“Colaciello”), Patricia O’Connell (“O’Connell”), Virginia Patterson (“Patterson”), and Loudoun County School Board (“LCSB”), by counsel, and pursuant to the Court’s ruling at hearing held on October 4, 2019, respectfully move this Court for leave to file additional evidence, in the form of three videos of public meetings at which the allegations in the lawsuit were fully discussed and revealed, to the following pleadings previously filed by the defendants: Doc. 36 - Defendants’ Opposition to Plaintiffs’ Motion for Order of Protection and to Seal Unredacted Answer and Doc. 48 - Defendants’ Opposition and Objections to Plaintiffs’ Objections to Magistrate Judge’s Order. These videos will be hand delivered to the court.

WHEREFORE, defendants Bridgett Beichler, Felix Colaciello, Patricia O’Connell, Virginia Patterson, and Loudoun County School Board, by counsel, respectfully request that the Court grant this motion for leave to file additional video evidence to the previously filed Documents 36 and 48.

**BRIDGETT BEICHLER, FELX COLACIELLO, PATRICIA  
O’CONNELL, VIRGINIA PATTERSON, and LOUDOUN COUNTY  
SCHOOL BOARD**

By Counsel

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2019, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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